

DRAFT

EVALUATION REPORT

Robinson Oil Corp.- Rotten Robbie #40
2515 Guerneville Road
Santa Rosa, CA 95401
GDF#4956
Application #14540

BACKGROUND

Beth De More of Robinson Oil Corp. on behalf of Janine Morgan and Rotten Robbie #40 submitted this application to increase the throughput limit at G#4956. This application is a companion to A/N 13748, which was granted an Authority to Construct on 4/21/06. A/N 13748 covers the physical modification of the site. They were granted an A/C to upgrade the under ground storage tank sumps, piping, dispensers, and will include Enhanced Vapor Recovery Phase I and Phase II with an In-Station Diagnostic (ISD) system. This station is currently permitted at 2.73 million gallons per year (condition #8525). The baseline is 2.73 million gallons per year, as established under A/N 10285.

A risk screen was performed under A/N 13748(fees for this were paid under this application), and indicates that an increase of 13 million gallons per year throughput is acceptable under the District's Risk Management Policy and complies with District Regulation 2 Rule 5 Section 302. Accordingly, this station will now be conditioned to 15.7 million gallons per year pursuant to condition #13607.

This station is within 1,000 feet of Woodside West Elementary School triggering the Public Notice requirements of the Waters Bill. There are no other schools within ¼ mile of this station.

Before the throughput increase can be approved, a 30-day public comment period will be held. Notice describing the project and announcing the public comment period will be mailed to the parents of students attending the above school and businesses and people living within 1,000 feet of the station. The cost of preparing and distributing this notice will be borne by the applicant.

EMISSION CALCULATIONS

Emission factors are taken from the Gasoline Service Station Industry-wide Risk Assessment Guidelines developed by the California Air Pollution Officers Association's (CAPCOA) Toxics Committee. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput increase of 13 million gallons per year is based on the results of the Air Toxics Risk Screening.

Emissions increase:

(13 million gal/yr)(1.27 lb/1000 gal)	= 16,510 lb/yr
	= 45.2 lb/day
	= 8.3 TPY

Benzene emissions increase: (13 million gal/yr)(6.75 lbs Benzene/million gallons)
= 87.8 lb/yr
= .24 lb/day
= .044 TPY

NEW SOURCE REVIEW

This station will emit more than 10 lbs of VOC in a single day. Thus the BACT requirement of Regulation 2-2-301 is triggered.

BACT for GDFs is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified. This facility will comply with this requirement.

Emissions from this station will remain less than 10 tons per year. Per Regulation 2-2-302, offsets are not required.

TBACT

The increased risk from this project exceeds 1 per million, triggering the use of TBACT equipment per Regulation 2-5-301. TBACT for GDFs is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified.

COMPLIANCE

A. Permits – General Requirements, Regulation 2, Rule 1

1. **California Environmental Quality ACT (CEQA), Ministerial Projects, Regulation 2-1-311:** This project is considered to be ministerial under Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors in accordance with Permit Handbook Chapter 2.3. and therefore is not discretionary as defined by CEQA.
2. **Public Notice, Schools, Regulation 2-1-412:** The facility is located within 1000 feet of the outer boundary of Woodside West Elementary School. It is therefore subject to the public notification requirements of Regulation 2-1-412. A public notice will be sent to all parents of students of the above-mentioned school and all residents within 1000 feet of the facility. There will be a 30-day public comment period.

B. Permits – New Source Review, Regulation 2, Rule 2

1. **Best Available Control Technology (BACT), Regulation 2-2-301:** BACT is triggered because the facility will emit more than 10 lbs of VOC per single day. BACT requirements are satisfied by the use of CARB certified Phase I and Phase II vapor recovery equipment.
2. **Offsets, Regulation 2-2-302:** Because the total facility emissions will be less than 10 tons per year, the facility is not required to provide offsets.

C. Permits – New Source Review of Toxic Air Contaminants, Regulation 2, Rule 5

1. **Best Available Control Technology for Toxics (TBACT), Regulation 2-5-301:** TBACT is triggered since the increased cancer risk from this project exceeds 1 in one million. The facility complies with TBACT for GDFs.

2. **Project Risk Requirement, Regulation 2-5-302:** The increased cancer risk does not exceed 10 in one million, the chronic and acute hazard indexes do not exceed 1, and therefore the project complies with the project risk requirement.

D. **Fees – Regulation 3**

All applicable fees have been paid.

E. **Gasoline Dispensing Facilities, Regulation 8, Rule 7**

The facility shall comply with Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders VR-102-E and VR-202-A.

RECOMMENDATION

I recommend that a Change of Conditions be issued to Robinson Oil Corporation – Rotten Robbie #40, located at 2515 Guerneville Rd., Santa Rosa CA 95401.

By: _____
John Foster
AQ Specialist I

Date: _____
4/28/06